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May 2, 2022

Lynn M. Retz
Executive Director
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604

RE: Docket No. 22-GIMG-405-MIS

Dear Ms. Retz:

Enclosed for filing are the Reply Comments of Black Hills/Kansas Gas Utility Company, LLC d/b/a Black Hills Energy in Docket No. 22-GIMG-405-MIS regarding the investigation initiated by the Kansas Corporation Commission's Guidance Order dated March 1, 2022.

Respectfully submitted,

/s/ Douglas J. Law

Douglas J. Law
Associate General Counsel

DL:ce

cc: Service List
Rob Daniel
Ann Stichler

BEFORE THE STATE CORPORATION COMMISSION
OF THE STATE OF KANSAS

In the Matter of the Miscellaneous Investigation)	
into the Use of a Laser Absorption Spectroscopy)	
Platform Coupled with Data Analysis Software)	Docket No. 22-GIMG-405-MIS
as an Approved Method to Perform Natural Gas)	
Leak Surveys as Required by K.A.R. 82-11-)	
4(b)(32))	

REPLY COMMENTS OF BLACK HILLS ENERGY

Pursuant to the Kansas Corporation Commission's ("Commission") Order dated March 1, 2022 ("Guidance Order") in the above-captioned proceeding, Black Hills/Kansas Gas Utility Company, LLC, d/b/a Black Hills Energy ("Black Hills Energy"), submits its reply comments in the Commission's general investigation into issues relating to the use of a laser absorption spectroscopy platform coupled with data analysis software as an approved method to perform natural gas leak surveys as required by K.A.R. 82-11-4(b)(32).

I. INTRODUCTION

1. As Black Hills Energy stated in its Initial Comments in the proceeding, Black Hills Energy appreciates the opportunity to comment on the Commission's investigation into the issues raised by the Staff in this docket.

2. Black Hills Energy also noted in its initial comments that Black Hills Energy does not currently employ a natural gas leak detection process similar to the leak detection equipment used by Kansas Gas Service, which is the subject matter of this proceeding.

II. RESPONSE OF BLACK HILLS ENERGY TO THE COMMISSION'S ISSUES

3. Upon review of the initial comments submitted by other participants in this proceeding, Black Hills Energy does not take issue with any of the initial comments submitted. As

previously stated, Black Hills Energy is willing to explore new technologies that could result in more frequent, more efficient, or more accurate leak surveys of natural gas piping for purposes of safety and our own duty to our customers. Black Hills Energy shares several of the concerns raised by Kansas Gas Service. To that end Black Hills Energy supports Kansas Gas Service in its efforts to find the appropriate interpretation of the Commission's safety regulations while balancing the cost and administrative efficiencies of new and improved gas leak technology.

III. CONCLUSION

4. Black Hills Energy remains interested in participating in this proceeding and to continue working with customers, Staff, CURB, the Commission, and other gas utilities to explore the new technology in gas leak detection in Kansas.

Respectfully submitted

/s/ **Douglas J. Law**

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CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2022, a copy of the above and foregoing was served on the following:

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